

G. (LEE VINCENT Yabrough)  
O. M.M. 3° T.N. Jurisdiction  
A. PHI  
T. III AMENDED Complaint  
U.

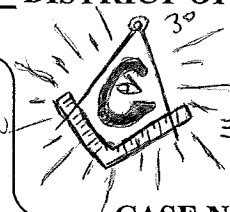


Pg 1 of 15

\* U.S. Const. 7th amends  
Jury trial DEMAND  
"Common Law"  
\* ART III Jurisdiction  
(A.K.A. The Kings Bench)  
\* Summons an Complaints  
For Marshal Service attached  
Hereto  
≡ P.H. = M.M. 3° = 7th chakra Activation

UNITED STATES DISTRICT COURT  
Middle DISTRICT OF TENNESSEE

DEVORIS Antoine NEWSON  
D.A.N. 4  
ALL RIGHTS RESERVED, WITHOUT PREJUDICE  
DEVORIS A. NEWSON  
Plaintiff, pro se,  
JACHIN BOAZ  
v.  
TRINITY SERVICES GROUP INC., Et. Al  
Defendant.



CASE No. 3:23-CV-00081  
SACRED GEOMETRY  
JUST-I-CE = JUSTICE  
JUDGE RICHARDSON = High Priest

P.H. H.A. H.T.

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS  
UNDER 42 U.S.C. § 1983, 1985 (3)

RECEIVED  
JUN 27 2023

PHEONIX

U.S. District Court  
Middle District of TN

I. PREVIOUS LAWSUITS:

A. Have you begun any other lawsuit in either state or Federal court dealing with  
the same facts involved in this action or otherwise relating to your  
imprisonment? YES \_\_\_\_\_ NO X

EAGLE

B. If your answer to A is YES, describe the lawsuit in the space below.

1. Parties to the previous lawsuit:

Plaintiffs: \_\_\_\_\_ N/A

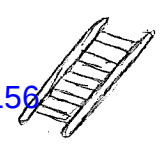
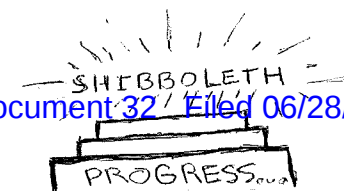
Defendants: \_\_\_\_\_ N/A

2. COURT: \_\_\_\_\_ N/A

3. Docket Number: \_\_\_\_\_ N/A

4. Name of Judge to whom case was assigned: \_\_\_\_\_ N/A

JAH-BUL-ON  
\*LO\*





5. Disposition: (dismissed – appealed – pending) N/A

6. Approximate date of filing lawsuit: N/A

7. Approximate date of disposition: N/A

II. PLACE OF PRESENT CONFINEMENT: Tennessee Department of Corrections  
at Trousdale-Turner Correctional Center, 140 Macon Way, Hartsville, Tennessee  
37074.

A. Is there a prisoner grievance procedure in this institution?

YES X NO       

B. Did you present the facts relating to your complaint in the state prisoner  
grievance procedure? YES X NO       

C. If your answer is Yes,

1. What steps did you take? UNSWORN  
DECLARATIONS, LETTERS, Grievances  
Communication with JOB Coordinator Chief Warden, TDOC Commissioner,  
Gov. of T.N., CEO of Core Civic, Human Rights Commission, Secretary of the  
State of T.N., Governor
2. What was the result? Job loss, Assaulted, Death threats, Nerve Damage  
Brain Damage, vision loss, hearing Damaged, Almost Killed  
Conspiracy to deprive me of my civil Rights, Grievances Never  
Documented destroyed, UNLAWFULLY Extradited without due process of Law

D. If your answer to B is No, explain why not:       

(Attach copy from each stage which shows results of grievance.)

E. If there is no prisoner grievance procedure in the institution, did you complain  
to the prison authorities? YES X NO       

F. If your answer is YES,



1. What steps did you take? Followed the grievance protocol, File human Right Complaints Etc.
2. What was the result? They were never given A number, never documented Destroyed, Rejected, denied, no hearing ever given

### III. PARTIES:

DEVORIS ANTOINE NEWSON A.K.A NEGASIX <sup>3</sup> 

A. Name of Plaintiff: ~~Trinity Service Group Etc. AL~~

Present Address: <sup>VOID</sup> Trousdale-Turner Correctional Center, 140 Macon Way,


<sup>VOID</sup> Hartsville, Tennessee 37074 <sup>VALID</sup> EL PASO COUNTY JAIL ANNEX, 12501 MONTANA AVE.,  
EL PASO T.X. 79938

Permanent home address: NEVER will BE Disclosed, P.O. BOX preferably

B. Defendant: Trinity Service Group Etc. AL

Official position: Corporation

Address of place of employment: 477 Commerce Dr. Oldsmar, FL 34677

1.  Bill LEE : Governor of T.N., ~~XXXXX~~ <sup>3</sup> T.D.O.C. Commissioner, <sup>3</sup> Assist. Commissioner,  
 4. Governor of T.X. 5. Sheriff Richard Wiles 6. CEO DAMON HINNINGER T.T.C.C.  
 C. Additional Defendants: 7. CEO DAWN HAMMOND 8. T.T.C.C. WARDEN 9. Assist. Warden  
 10. Core Civic Corp/Inc. 11. Mrs. Tarissa Fairbanks 12. Mrs. Waggoner 13. Miss Daily 14. Case manager  
 Bail 15. Unit Manager Robertson 16. Chief Harris 17. Captain Smith 18. CO# spence 19. Chief of Security  
 20. TRINITY FOOD SERVICE

### IV. STATEMENT OF THE CLAIM(S):

#### Assertions

1. Plaintiff has been brutally assaulted and Almost Murdered on at least 5 different occasions while at T.T.C.C. under the supervision and custody of Core Civic.
2. Plaintiff as well as thousands of inmates At T.T.C.C. have been exposed to deadly weapons, cocaine, weed, tobacco, Fentanyl, methamphetamine, corruption "official" while understaffed
3. Plaintiff asserts that Dangerous Conditions at T.T.C.C. were well known to Defendants
4. Plaintiff Claims for this suit will focus on Events From October 2022 on up.
5. Plaintiff will however start from the Beginning In order to give the court and the public an overall overview of how all party's are involved
6. It was common knowledge To all defendants within T.M. That the prison population at TTCC was heavily armed and understaffed causing dangerous conditions.
7. This was clear from D.O.C. fines an investigation, Numerous civil suits, complaints on ~~grave~~ grievances by plaintiff and others as well as the unusual death rate and coverups in order to preserve employees positions. In maintain the oppressive Tyrannical, Corrupt Jim Crow Status.
8. All T.N. party's had knowledge of the substantial risk of serious harm facing prisoners at T.T.C.C.
9. This knowledge was Based on Incident reports regarding the chronic, specifically, enumerated assaults, Reports By I.A. Investigations, Chief of Security Investigations,
10. This Including TTCC publicly available reports establishing a systemic Problem Leading up to the murder attempts on Plaintiff at T.T.C.C.
11. Receiving that weapons, understaffing, injuries, beatings, drugs, OVERDOSES, Fights, stabbings an deaths.



12. An Average of 20 assaults a occurred from 2016 to 2023 many unreported Due to DOC fines an investigations. (corrections)
13. In 2020, the ~~USA~~ Department of Justice ("DOJ") opened an investigation on core civic into whether the conditions in Core Civic Prisons in T.N. For men
14. This Included T.T.C.C. violated the eighth amendment of the U.S. Const.
14. The D.O.C. Investigation Related to whether (1) Core Civic adequately protects prisoners from physical harm, sexual abuse at the hands of prisoners, understaffing of employees, and providing prisoners with safe living conditions at prisons including T.T.C.C., overflow of weapons
15. All Top officials Received notice of the D.O.C. Investigations which resulted in Core Civic Being fined over 2 million dollars
16. It became Common Knowledge By Ceo Dan Hininger, T.D.O.C. Commissioner, Governor Bill Lee that the prison population at TTCC was heavily armed and under staffed
17. Defendants also knew that contraband search protocols at T.T.C.C. Due complaints by inmates, civil litigation initiation an results from investigations external as well as internal
18. Through all the above Defendants knew or should have known that T.T.C.C. under CoreCivic Supervision was a death trap... where inmate murders were the norm.
19. D.O.C. fines an investigations, Core Civic Mass prison lockdowns within T.N., personal observation, internal communications, use of force reports, incident Reports, medical Reports an external sources such as previous civil litigation put parties on notice of the culture of abuse of prisoners By violence an understaffing,
20. Prison BEATINGS, stabblings, overdoses, an rapes were epidemic, violence an terror Reigned and the threat of assault was constant.
21. DOC Fined Core Civic 2 million for short-staffing and other contract violations at T.T.C.C. IN 2018
22. T.N. States 2020 Performance Audit of DOC. 4 prisons CoreCivic operated for DOC - TTCC, Hardeman CCF, South Central CF, and Whiteville CF - there a total of 3,052 "Class A" incidents "Involving Serious Risk to the Facility or Community"
23. These class A incidents occurred From October 1<sup>st</sup> 2017, to April 1<sup>st</sup> 2019, 12th
24. During this same time, there were just 1,739 IN The states other 10 Lockups combined.
25. In the Boaz Pleasant - Bey v Tenn. USDC (M.D. Tenn.) Pl/  
- AINTH evidence contained statements from CoreCivic personnel addressing a shortage of guards at the prison
26. Core Civic has a ~~policy~~ practice of maintaining staffing levels in sufficient to ensure that the Plaintiff an all other inmates safety from ~~violent~~ violent prisoner Attacks,
27. This practice has been ongoing for at least 5 yrs.
28. Core Civic has had a ongoing practise of leaving W-unit pod doors unsecure an Allowing inmates from anywhere to enter pods there not allowed in or assigned to.
29. They have allowed this even when inmates are sound asleep in the beds late at night. Which was the moving force behind January an Feb. incidents of 2023
30. This practices are responsible for my physical an mental injuries, including Brain damage, Black outs, uncontrollable brain ~~spas~~ migraines, sleep paralyze, Nose Bleeding "Random", Blurred Vision, Ear drum Damage, permanent nerve Damage, P.T.S.D, an Insomnia, Neurological damage
31. All claims made herein against T.N. defendants are due to common customs an practices of the following. Core Civic an its employees of the following
32. Failure to separate violent inmates from non-violent inmates
33. Understaffing, lack of Training, failure to segregate dangerous inmates
34. failure to conduct adequate searches for weapons, deliberate Indifference to the health an safety of inmates.





35. Around 2-21-21 while incarcerated unlawfully at T.T.C.C. after quarantine protocol.
36. Plaintiff through grievance/unsworn declaration notified ~~at~~ The Governor of T.N., T.D.O.C Commissioner, Ceo Dan Hininger, and T.T.C.C. Chief Warden of his reason for being unlawfully incarcerated in the worst Prison in the state of T.N. (Also notified was the Governor of T.X.
37. Plaintiff stated he was not supposed to be in prison
38. That his cases in Madison County 19880 and 19879 were still pending due to him filing a timely T.N. Crim. of P. 32(F) motion to withdraw guilty plea
39. That Judge Kyle C. Atkins of the 26th Judicial District Ct. at Jackson T.N.
40. Along with Now-pro-tempore Assistant D.A. Benjamin Mayo, an Madison Count Sheriff orchestrated a false prison transfer with the T.D.O.C Commissioner and Ceo Dan Hininger's approval.
41. He also stated that his attorney Kortney Simmons was paid by Judge Atkins on the D.A. Legal. To allow it to happen, and to attempt frivolously to convince the plaintiff that everything was
42. He stated the Unlawful Prison Transfer based off of knowingly fraudulent Invalid void Judgment forms signed By Judge Atkins and Assistant D.A. Ben Mayo in Retaliation to silence him.
43. By any means necessary to cover-up the fact that Members of El Paso Sheriff's department (i.e. Sheriff Richard Wiles and deputy Jaime Hernandez Sr.) conspired with Members of Madison County Sheriff's, Sheriff Mehr, Sheriff Deputy Ben Moyer and Deputy ~~Stobard~~ Nickell Jacobs.
44. In which I was to be <sup>assassinated</sup> on the early morning of March 31st 2019 in Jackson T.N. By Deputy Nickell Jacobs
45. Due to my failure to make a drop in Memphis T.N. for Sheriff Richard Wiles and Deputy Jaime Hernandez Sr.
46. This drop consisted of 2 kilos of Pure Colombian cocaine, 10,000 Quadruple stack meth based and MDMA Based Ecstasy pills, \$25,000 dollars cash, 2 Ar-15's, 5 hundred round drum clips, 5 nine millimeter handguns with modified switches
47. 4 Baby Draco's with modified switches, Blue tip ammunition as well as green tip ammunition.
48. Due to too many adult witness's including Deputy Jaime Hernandez Sr.'s, daughter IRIS MAE Flores, Plaintiff's fiancé at the time.
49. Deputy's Moyer and Nickell's went with plan B and instead falsely ~~alleged~~ alleged the car was stolen from Dallas T.X. in which the plaintiff was in possession of.
50. After knowing full well Deputy Jaime Hernandez's Sr. Son Jaime Hernandez Jr. purchased the vehicle in el Paso T.X. in early March 2019.
51. In which the deputy's jumped in the vehicle drove it to an undisclosed location and confiscated the drugs, money, and guns in which was privately returned to Sheriff Richard Wiles and Deputy Jaime Hernandez Jr.
52. In retaliation the plaintiff contacted M.C.S.O. Recorded line and report that the Sheriff's of Madison County entered 436 Pipkin Rd. unlawfully at around 4 to 5 am
53. In which in front of 3 adult women the Sheriff Deputy Ben Moyer and Deputy Nickell Jacob unlawfully obtained the vehicle and drove the vehicle from the premises
54. In retaliation Sheriff Mehr of M.C.S.O. ordered Moyer and Nickell's issue an unlawful General sessions warrant orders that a S.W.A.T RAID Issue upon the plaintiff's arrival at 436 Pipkin Rd.
55. In which under cover informant Rodrickous Woodruff and Arron Morgan Junior was to notify The Sheriff upon plaintiff entering that residence in which he was to be shot during the Raid
56. Plaintiff was notified due to his fraternal ties to the prince hall organization in advance and avoided the assassination attempt again.
57. Which led to the orchestrated ~~attempt~~ conspiracy between the Judge, D.A. Mayo, Sheriff Mehr, T.D.O.C. Commissioner, and CEO DAN HININGER To orchestrate a unlawful prison sentence for this plaintiff Chief Warden
58. In Retaliation the ~~law enforcement~~ ordered that I be placed in E-unit the most dangerous prison unit on T.T.C.C. Compound
59. Within 2 hrs I was almost beat to death in which I suffered concussions and a dislocated Broken Jaw
60. This led to Suppressing of Incident reports made by plaintiff By T.T.C.C. Chief Warden

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61. Multiple operations due to Core Civic's Refusal to provide medical attention for over 3 months leaving plaintiff to suffer unimaginable pain.
62. The led to the plaintiff having to have his jaw medically broken again in which resulted in infection an another operation
63. This was due to core civic's custom of inadequate and or understaffing of medical doctors as well as equipment
64. The injuries occurred due to corecivic's custom of understaffing employees which Resulted in on 500 ~~years~~ inmates controlling a running there own pods, while
65. One officer sitting in the rotunda area does nothing but enter the Pods To count every 2 hrs.
66. To finish the Job on the Plaintiff while in the medical unit for his injuries Chief Warden sends the Main Gang member who was Identified to have initiated the Attack on the plaintiff
67. To reside in the medical unit an pod in which the gang member stated he was ordered By the chief Warden to finish the Job.
68. Instead the plaintiff paid the gang member \$600 IN stimulus money to not finish the Job as ordered by the Chief Warden of T.T.C.C.
69. It would be another year before plaintiff would have the physical an mental strength to speak out again concerning his situation.
70. In between this time the plaintiff filed grievances concerning this matter and gave notice to the T.D.O.C. ~~Commissioner~~ Commissioner, Chief Warden of T.T.C.C., an Ceo of Core Civic
71. Governor of T.N., an Director of D.O.C.
72. I notified them of the extreme staff shortages, over flow of violence, weapons and drugs
73. I stated that these things had not only impacted my physically "literally" but many other inmates as well
74. I stated through research I discovered this situation had been allowed to continue at T.T.C.C. for years resulting in D.O.C fines an investigations, Deaths of prisoners.
75. I stated that they had obligations as the higher authority's to take action to prevent the Deadly conditions that was common knowledge an common ~~place~~ practise at T.T.C.C.
76. I stated that these common customs almost cost me my life an health as it has to so many others at T.T.C.C.
77. In response the Gov. of T.N., CEO of Core Civic, T.D.O.C. Commissioner, an Director of D.O.C. including the Chief Warden. Ignored me.
78. By silence an in action of these party's, I presumed that my Black life didnt matter
79. Even though I clearly stated in my grievance/Unsworn declarations that these party's had an administrative duty "ministerial", By there oaths of office...
80. To TAKE action to prevent prisoner on prisoner violence, unstaffing of employees who were not properly trained creating literal death traps at T.T.C.C. For inmates as myself
81. I made it a point to note that Even President Joe Biden had Nothing good to say about Core Civic.
82. I also stated that I as a prisoner with regard to safety had a constitutional right to be reasonably protected from constant threats of violence.
83. I stated that this meant that I did not need to wait until another murder attempt or violent attack happened again to me, before obtaining aid, assistance, an relief from them all.
84. I stated that failure of these officials to take actions would result in 8th amend. U.S. Const. violations
85. that I clearly allegede to them that the deprivation against me and thousands of other prisoners was objectively as well as sufficiently Serious.
86. I stated that not only by my Notice but past events leading to civil suits an fines, T.T.C.C. including myself. Health an safety
87. That All officials know an have known of and have disregarded the excessive risk to inmates at T.T.C.C.
88. That the officials were both aware of the facts from which the inference could be drawn that a substantial risk of serious harm exists, an that it is clear from Investigations an reports,
89. That they have clearly done the following
90. ~~State~~ The party's in return did not dispute nor contest the grievance/Unsworn declarations Rather Ignored me.



91. In the early days of June 5<sup>th</sup>, 2022 I had Lt. Holmes of T.O.C.C. check my status custody level
92. In return he informed me that I was S.T.G'd as a Blood Gangmember
93. I in turn informed him that was impossible my soul ties lied with the Fraternal order of the Princehall organization.
94. I then filed a title VI against S.T.G. officer Mcloyd asserting discrimination, malignant Nefarious profiling due to Being Black with tattoos
95. I explained the esoteric symbols on my body to the profane T.O.C.C. TITLE VI Coordinator Assistant Warden Jaqueline Normin.
96. In retaliation Warden Normin ordered S.T.G. Mcloyd an dog-man K-9 officer to enter my cell in unit B while I was at work in the Dining hall.
97. Collect legal documentation with my name on it an use it to forge my name on a clearly invalid voluntary statement.
98. STATING THAT I voluntarily admitted to being a gang member
99. They then in retaliation told my cellmate and other known violate crips known for stabbing people to death that I was a blood member.
100. This was after they had just killed a blood in this pod on camera less than 3 months prior
101. I initiated another title VI concerning this matter in turn.
102. While coming from the law library in the early July 2023 in retaliation a murder attempt orchestrated by assistant warden Normin, Case manager Bail, STG Mcloyd, an Homosexual sergeant female Garcia
103. As I approached the Unit B pod door I noticed 2 crips close to the door one (A.K.A Smeatry)
104. The officer refused which was extremely unusual seeing as how I lived in the pod.
105. Later Case manager Bail arrived an opened the door he then stood in between the door and asked me was I coming in
106. At this time Sgt. Garcia started to order me to step in the pods
107. One of the A crips pulled out his knife on camera right beside bail staring at me
108. I then refused to go into a death trap seeing full well that All staff witnessed what I just saw,
109. Sgt. Garcia in retaliation threw me in medical an stated I refused a cell assignment
110. After I spoke with the Captain an attempted to file a BI-C an requested I be allow to contact my dad for my own safety
111. The Captain reviewed the video footage a confirmed my story
112. He then asked me not to make it a big issue an stated in turn he would have me moved to minimum custody open bay that same night
113. He stated I needed to keep the matter discreet for my own safety seeing as how I stirred up a hornets nest,
114. In return I exchanged a symbolic token handshake with him an complied.
115. In early August 2022 after working in the dining hall about 7 months I came to learn that my work credits were not being processed. By Fairbanks an Wagner,
116. I also had enough of the Discrimination an Injustices that I had seen imposed on other inmates an particularly against myself
117. I addressed these issues with both stewarts Director Fairbanks an Wagner,
118. I stated I noticed several discriminatory Practices against inmates including myself, including...
119. I noticed that Both Stewarts had a common custom and practise of firing any inmates who spoke out exercising there 1st amendment right to Freedom of speech. Without due process of law.
120. Concerning Allowing gang members in wagner and fairbanks close circle to run the kitchen
121. STEAL, sell drugs, use cell phones, cook whatever they want...
122. Transport unlimited amounts of T.O.C.C. meat products through carts By Head cook Larry personally transporting them to units.
123. Yet they would fine an or prevent assigned kitchen workers from working without a write-up or a proper hearing
124. All because they would either file grievances or address the situation. With the stewarts
125. Both Fairbanks an Wagner told me that if I didn't like it to QUIT, they made there own customs an policies.
126. I Responded that there closest workers are allowed to take credit for my physical advances towards the stewarts, drugs as well as sell them.
127. Yet you fine inmates that work hard for having extra amounts of sugar. An for speaking out against

accordingly

certificate of service

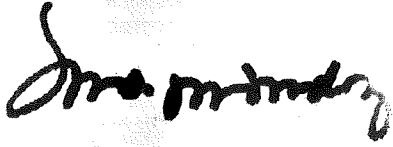
i have caused a true and correct copy of the rule 60 motion to be filed with the federal district court clerk along with additional copys for defendants one to be mailed back to me by u.s. mail this 8th day of janurary 2023 signature :



## unfair treatment

128. In return On August 10<sup>th</sup> 2022 I filed a grievance/unsworn declaration concerning this injustice to Trinity food CEO, CEO Da Hininger, T.D.C. Commissioner, Chief Warden of T.T.C.C. an Chief Harris as well as Job Coordinator Blackwell, And close friend of Fairbanks Assist. Warden Normin.
129. In this grievance/unsworn declaration I stated everything I stated above in Claims 116.-127.
130. I also stated the Core Civic employee Kitchen officer lean consented to an enforced these unjust actions.
131. I was ignored by all but Job coordinator Blackwell an Fairbanks ~~Wagner~~ ~~Wagner~~ ~~Wagner~~
132. Fairbanks in early october 2023 stated she was aware of my allegations made to the chief warden
133. And her Boss CEO Hammond of Trinity Food Services
134. She stated that if I valued my life and didnt want anything as far as accidents to happen to ~~me~~ ~~me~~ ~~me~~
135. That I should keep my mouth shut.
136. She stated all Trinity Employees Wagner an daily were on board including CO#leon
137. She stated that if she gave the word any inmate within her circle would permanently put me out of service.
138. She stated that I should do whats best for my health an not return to the kitchen
139. I in turn stated that I had no fear of her demonic cult like inner circle.
140. That I being a traveler in search for wages had over 25 million fraternal Brothers as well as Sisters all across the Nation.
141. Some at the very top of the hierchal Judicial pyramid, that we all walk in the light.
142. That if fairbanks was ashamed of the truth she should take action.
143. I assured her that if I was truly in "distress" that I would recieve aid an assistance.
144. I then showed her a human angle an walked away.
145. I then filed a grievance/unsworn declaration given notice of the above colloquy an actions through T.T.C.C., T.D.C. Commissioner, CEO HAMMOND, CEO Hininger, an the Governor of T.N., D.C. Director)
146. I asserted they had a administrative duty to take action to prevent the immediate threat against my life by Trinity staff an core civic employees.
147. Not one of the officials Disputed the allegations Nor did they take action to prevent harm.
148. On October 10<sup>th</sup> 2022 around 6 to 7 a.m. I was called into the office of the kitchen AREA an met by Trinity Staff Wagner an Daily.
149. Wagner said that they had warned me about trying to be a (civil negra fighter)
150. She stated that noone liked my kind at Trousdale an that I was fired.
151. She stated that this was the final warning to stay out of the kitchen an never return.
152. I Begin to cry out against this injustice through Chief Harris and Job Coordinator Blackwell through Grievance an Request forms.
153. I also again Gave notice to the Director of D.C., Governor of T.N., CEO Hammond, CEO Hininger and the T.D.C. Commissioner,
154. Again I requested they take action, to no avail, even though they had an administrative obligation to prevent imminent threat.
155. Blackwell however advised me keep attempting to go to work so that it would be on CAMERA
156. The claim here goes with line 151. = I stated to wagner that Blackwell would not allow this injustice, she stated in turn.
157. Blackwell can send you up here and I'll send your Black Butt Back
158. Continue's of line 155.
159. Upon my ~~last~~ last attempt in early november of trying to work. I was met by kitchen ~~officer~~ ~~officer~~ ~~officer~~ officer lean. This occurred on 11-18-22
160. He smiled at stated that I just wasnt going to learn
161. He then said noone likes civil negra fighters around here at T.T.C.C. making trouble and that I would not be allowed back in the kitchen
162. He smiled even more at stated he had a warning for me. I was then returned from Wagner.

Thank you for your attention.  
Sincerely,

A handwritten signature in black ink, appearing to read "Maria Salas-Mendoza", written over a faint rectangular stamp.

MARIA SALAS-MENDOZA  
Judge

cc: Public Defender's Office  
District Attorney's Office



163. Once given to me It falsely stated I was fired on 10-10-23 for stealing a Pan full of onions, stating she witnessed this
174. I then looked intently into the eyes of kitchen officer Leon and stated it was not wise to involve himself in this malignant matter of obvious subterfuge.
165. Coming from depraved human beings of the lowest frequency's walking in ignorance.
166. Leon replied "yea, yea" save it for someone who cares even fairbanks fired you and she's extremely Black, Enjoy your day.
167. He then stated "oh I almost forgot Fairbanks, Wagner, and daily said if I saw you again to remind you not to forget to sleep with one eye open."
168. At this stage I made contact with chief Harris and gave her the write-up in which she stated she would review the camera.
169. I also informed her of the continuous threats, along with Governor Bill Lee, Director of OOC, TDOC Commissioner, CEO Hammond, CEO Dave Henniger, and Chief Warden off T.T.C.C. By grievance unsworn declaration.
170. A few weeks later near the end of December I was ordered by chief Harris to return to the kitchen, in which I was given a raise and a New Job position of Cook Prep. This occurred on 12/30/23.
171. When I tried to retrieve the retaliatory write-up from chief Harris she refused to give it to me, stating there was no need to create waves I got my Job back.
172. On 1-10-23 From 2:00 am. to 5:00 am. I was allowed to work during this Time Trinity.
173. Food Stewart Daily Initiated an incited a riot against me on video.
174. She told the kitchen workers Larry, A.J., Worm, and several others to keep me out of her face and her name out of my mouth.
175. These workers were extremely aggressive and violent they wanted to know how I got my Job back after they assisted in getting me fired.
176. On camera I was threatened by the inmates to be beat, stabbed, and jumped.
177. This was all due to the fact that I was allowed to work against the Director Fairbanks authority.
178. Through all of the threats of violence and assaults made I maintain my composure.
179. This further infuriated Daily you can see her on video getting very upset, they her demonic attacks on me had no affect.
180. She eventually snapped and called me over to line one on video.
181. She stated that I should never have come back to the kitchen and that I should beware of of the hit that would be sent on my life.
182. She stated that I knew full well that I had been warned by Leon, Fairbanks, and Wagner what would happen if I came back.
183. She then asked me to leave the kitchen in which I complied.
184. While waiting on the T.T.C.C. kitchen officer who had left her assigned post in the kitchen.
185. To venture off somewhere on the compound.
186. I walked in the dining hall yet that was short lived due to Head kitchen worker Larry using himself, A.J., Worm, and Mississippi.
187. Continuously turning off the dining hall light in order to initiate an assault against me.
188. However I continued to turn the light on so that T.T.C.C. Security cameras could view there.
189. Idiotic attempt at assaulting me.
190. Moments later I was allowed to leave on camera during count time.
191. Later that same evening I alerted Job Coordinator Blackwell while at the law library where I spent most of my time perfecting my legal craft.
192. I not only informed Blackwell of the incident that morning, I told her the kitchen was not the same.
193. I told her all my allegations could be proven on video.
194. I stated that you can even see on line 3. where I am located that Mississippi is clearly groping the heavy set Samoan Trinity workers bottom on camera.
195. I stated the cult like depravity that existed in the kitchen was of the darkest an lowest vibrations I ever felt.
196. Blackwell told me not to quit that I was causing a lot of change to take place due to me speaking out against the injustice taking place at T.T.C.C.



196. Blackwell told me told trinity food services staff had been warned several times, to stop violating T.O.C.s policies with there own customs, she stated T.O.C. Commissioner as well as the chief Warden had been notified.
197. This too is a camera as well.
198. Hours later On 1-11-23 while I'm completely sleep at or in between 3:00 to 5:00 a.m., Location WC-130
199. I am snatched from my top bunk an Brutally Beat By 2 assailants, they state while beating me that I should have stayed out of the kitchen like fairbanks said.
200. The assailant later identified as a kitchen worker pulls out a knife in an attempt to stab me in which we struggle over.
201. Coff spence then enters the pod which causes the attacker with the knife to look back
202. At that time I knocked the knife under 129's bunk
203. Coff spence sees this altercation yet keeps walking and refuses to get involved
204. Once he leaves the assailant goes around the corner on video an retrieves his ~~own~~ knife in which he has another knife
205. Both assailants Tell me to leave or die, in which I'm stunned to the point of confusion
206. I immediately comply this is all on video
207. Once I exit the pod the assailant who was not supposed to be in our pod but was let in by Coff spence goes back in his pod B
208. I then asked spence why he let him in an why didnt he do anything or call for back-up
209. He stated that I knew damn well that he is only one guard with no help watching 500 inmates By hisself
210. I asked him why the hell did he break security protocol an have the pod doors open and unsecure in the middle of the night?
211. He stated, I knew damn well that was the custom, for as long as I had been in W-Unit, that I was still alive to keep my damn mouth shut an go back in the pod.
212. I stated it is clear he had something to do with it seeing as how he Ironically had all the lights turned off in the Rotunda
213. He stated I knew the consequences of my actions when I started causing trouble for Trousdale Employees, I had been warned several times.
214. I stated I needed medical attention that I had hit my head pretty hard coming off the bunk
215. He stated to stop talking an to go back in the pod
216. I refused an stated he needed to do his Job.
217. He then said that he was gonna teach me a lesson I would never forget.
218. He then pushes his speaker an calls for backup says he has a man refusing a cell assignment
219. This he tells to Sgt. Batton
220. I respond to him stating he is the lowest form of the human race,
221. Sgt. Batton Comes with back-up orders me on the wall an if I move I'll be sprayed
222. I then respond by telling him he'll be sued if He sprays me
223. I then was able to explain to Sgt. Batton what took place, I also informed him that spence was lying in order to cover-up his involvement.
224. Sgt. Batton immediately took me to medical an contacts his Jom of Command Captain Smith
225. While waiting on medical attention captain smith comes an questions me about the incident
226. I tell her everything that happened she in turn takes me out of medical for no apparent Reason an places me into a intake lockdown cell an tells the staff I'm R.C.H.
227. After 2 hrs I'm finally able to convince the guard that I am not R.C.H. I was in medical
228. That Captain Smith done that to prevent any investigation an protect Coff spence
229. Before being released I make several copies of the incident report, the nurse is Given a Copys a places one in my medical Record, Captain Smith, Assist. Warden, Norman an Unit Manager Robinson. Are given copies.
230. Unit-Manager Robinson Calls me into her office an reviews the video footage with me an confirms my Incident Report.
231. I state I need to be shipped to a safe facility. That this facility is a death trap
232. I state no doors are ever secured, inmates are allowed to walk around with weapons for years, an understaffing an violence. It comes through her own investigation
233. After Robinson sees the a attackers through her own investigation

Review History of Assault
Review Victim Sensitivity
Review History of Sex Offense
Review Conditions of Supervision



234. She establish's the identity and location of Both the attackers
235. One's located in pod WC, my location the other in W03, yet she takes no action against these violent offenders.
236. Instead she ask me IF I would like to be placed in P.C.
237. I state though my lifes obviously in danger seeing as how you by your actions are refusing to take action against the known assailants...
238. I cannot afford to be placed in p.c. with no access to a law library
239. I state that it is common knowledge that P.C. is one of the most dangerous places to be at T.T.C.C.
240. Numerous inmates have been killed in P.C. at T.T.C.C.
241. I state that she along with every official at T.T.C.C. are aware of the numerous deaths that have taken place due to the drug trafficking, Overflow of Weapons, understaffing of security
242. Allowing gangmembers to run there ~~over~~ <sup>over</sup> pods, an surely had I Been killed early this morning My death as well would have been covered up.
243. She stated that's probably true but what can I do I'm a Unit Manager.
244. I responded stating that Robinson was being deliberately indifferent to this clear act of Prisoner on prisoner violence
245. She responded "cry me a River"
246. I responded you are aware that risk of serious harm exist against me an you are clearly disregarding that Risk By your callous Response an actions.
247. She responded By Asking "who are you supposed to be Johnny Cochran"
248. She then stated "Maybe if you learn to close your mouth an stop making trouble for T.T.C.C. employees things like this wont happen."
249. I demanded an emergency transfer
250. She responded By stating "Is that supposed to be a joke" "get out of my office"
251. I then on 1-11-23 Filed another grievance /affidavit Unsworn Declaration to the T.I.R. Governor Bill lee, T.D.O.C. Commissioner, Chief Warden of T.T.C.C., CEO Hammond, and CEO Rimminger as well as to the director of D.O.C.
252. I informed them of everything I stated above from line 159 to 251
253. I also notify them that 1 of the assailants who was located in my unit admitted on 1-11-23 that Dir. Fairbanks paid him an the other kitchen worker in heroin...
254. In exchange they agreed to kill me in my sleep. He Stated Co#spence was aware an had Been paid as well to look the other way.
255. The attacker was put out of the pod by other inmates this someday due to him being High on heroin, this is all on video.
256. I charged every supervisor by there oath of office to take action...
257. I stated there were a painfully clear casual connection established from the documented abuse at T.T.C.C.
258. History of widespread abuse ~~abuse~~ an that I personally have put all supervisors on notice of the need to correct the allegede deprivations...
259. Yet they have failed to do so an it was clear that there improper customs have resulted in deliberate Indifference to not only my rights By every inmate at T.T.C.C.
260. I specifically noted the dangers of T.T.C.C.'s entire compound, the mixing of close custody, medium and minimum inmates Based on the management customs an practices...
261. How they place individuals with behavior problems together in ~~single housing units~~ in general Population, lack of programming opportunities...
262. I noted that the lost 4 deaths at T.T.C.C. are a manifestation of the safety problems this kind of management creates.
263. I warned that "weapons, cocaine, meth, fentanyl, violence, Death, Murder, an O.D.'s continues to contribute to serious safety concerns as well as official corruption
264. That contraband searches continue to be sporadic and ineffectual, Despite these deficiencies, these supervisors failed to take action to improve supervision an monitoring at T.T.C.C.
265. I stated Due to the attack I suffered Black out's, uncontrollable migraines, insomnia, P.T.S.D an extreme paranoia
266. I then reprimanded the supervisors on notice of the existance of the culture of abuse created By T.T.C.C. an core circles ~~for~~ <sup>for</sup> ~~of~~ <sup>of</sup> ~~the~~ <sup>the</sup> ~~prison~~ <sup>prison</sup> ~~system~~ <sup>system</sup>
267. The resulting harm to prisoners as well as inadequacies of the existing customs an practices to prevent violence...

3/11

268. T.T.C.C. Management fostered the culture of violence By failing to provide an established grievance system
269. Failing to properly investigate and discipline acts violence, discouraging victims from reporting incidents of violence, and retaliating against prisoners such as myself who reported violence.
270. In my current physical condition medical treatment was not provided due to inadequate medical care, staffing and equipment.
271. This too all supervisors did not dispute, yet just as well, took no action.
272. On or about Feb 9<sup>th</sup> 2023 from 4300 p.m. to 6500 p.m. The guard let a man by the name of Stephen Beasley in our unit/pod WC in which it was known he was out of place.
273. The man having a life sentence for the murder of his wife and a Extreme history of violence approached me, with a knife tucked in his pants.
274. He said he had a message for me on camera from Chief Warden and Food Stewart Fairbanks, Wagner, and Bailey.
275. I asked what it was and I was hit on video by 2 devastating blows causing hearing damage to my left ear nerve damage under my left eye, and increased vision damage in my left eye.
276. He stated that I was to keep my damn mouth shut.
277. He then freely was let out the Unit by the same guard.
278. This took place on video in front of over 100 inmate witnesses.
279. I tried to get Case manager Bail To do a incident report and provide medical attention due to my injuries.
280. He refused said he wasn't getting involved I was causing too much trouble.
281. For 3 days I would seek his assistance due to be on compound lockdown.
282. I tried Unit manager Robinson she also stated she wasn't getting involved as well.
283. On 2-14-23 between 10 am to 1300 p.m. on camera I met with Chief Harris during count in WC pod.
284. I gave her the 51-C report told her no staff would get involved, and that I needed copies of my 51-C.
285. Chief Harris took my 51-C and never returned, took action to protect me nothing.
286. Around March 3, 2023 I was informed that I had a detainer out of El Paso for a pending charge case #20110001149 By case manager Bail.
287. I contacted By certified mail El Paso Judge Mendoza, Governor of TX, Sheriff Richard Willes of El Paso, T.D.O.C Commissioner, Chief Warden of T.T.C.C., Governor of T.N.,
288. I informed all parties that they were committing fraud.
289. I produced Federal ICAOS Documentation showing that I was convicted in 2015 for this crime and transferred to Kansas.
290. Where I was placed on parole under K.D.O.C as a convicted felon for this charge.
291. I produced Parole documentation from K.D.O.C., the Governor of Kansas verifying my statements.
292. I also informed them that any and all state officials involved are in violation of 18 U.S.C. 241 and is a federal crime.
293. Case manager Bail around ~~April~~ April 1<sup>st</sup> 2023 came to me and spoke to me in private.
294. He stated due to the constant complaints I had made against T.T.C.C. employees
295. And the threat of the potential collateral attacks against T.N. state officials including the T.D.O.C Commissioner
296. It has been worked out to get rid of you, you will receive no due process of law no court hearing nor a chance to contest the extradition.
297. Sheriff Richard Willes has been compensated and is on Board, he stated I would be extradited.

MISCELLANEOUS NUMBERS  
KS33111037

K02927090 {KS}  
K02927090 {KS}  
K03106926 {KS}  
K02927090 {KS}  
K02927090 {KS}  
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K02927090 {KS}

UNKNOWN

UNKNOWN

[illegible]

HEIGHT	WEIGHT	DATE OF BIRTH
5'09" (2008-11-22)	169 (2008-11-22)	1986-09-01
5'09" (2009-02-02)	169 (2009-02-02)	1986-09-01
5'09" (2009-04-30)	169 (2009-04-30)	1986-09-01
5'09" (2009-04-30)	169 (2009-04-30)	1986-09-01
5'09" (2009-10-30)	169 (2009-10-30)	1986-09-01
5'09" (2010-12-27)	169 (2010-12-27)	1986-09-01
5'09" (2012-01-25)	160 (2012-01-25)	1986-09-01
5'09" (2012-01-25)	160 (2012-01-25)	1986-09-01
5'09" (2012-01-31)	160 (2012-01-31)	1986-09-01
5'09" (2012-02-08)	169 (2012-02-08)	1986-09-01
5'09" (2012-02-27)	169 (2012-02-27)	1986-09-01
5'09" (2012-02-28)	169 (2012-02-28)	1986-09-01
6'02" (2012-04-02)	160 (2012-04-02)	1986-09-01
5'09" (2012-05-30)	169 (2012-05-30)	1986-09-01
5'09" (2012-06-01)	169 (2012-06-01)	1992-04-24
5'09" (2012-08-07)	165 (2012-08-07)	1986-09-01



298. He stated that had I not made complaints against fairbanks, Wagner, Daily, Smith, Spence The Warden or the Commissioner, this may have been prevented
299. The bottom line is they want you gone in order to prevent this from going any further
300. I stated this was a federal crime an a clear criminal conspiracy to deprive me of my Rights.
301. He stated that one day soon I would learn that when money is involved the law doesn't exist.
302. On 4-3-23 I was called to intake were I was met by an unknown plaind clothed U.S. officer allegedly from U.S. Dept. of Corrections.
303. He stated someone paid some big money to the U.S. Dept of Corrections Agency To fly me to el Paso Sheriff's dept that day.
304. I was told to sign certain release forms in which captain Smith erase or rather crossed out my signature on the documents...
305. Due to it being A Free an Excepted Masonic Esoteric Symbol, she erased my hand marked signature as a sign of disrespect for filing a lawsuit against her.
306. Since then I've been unlawfully incarcerated under Sheriff Richard Wiles Denied access to courts an proper medical attention for the injuries sustained at Trowdale.
307. I sought medical help several times with E.P.S.O. through Request an grievance due to Brain Injuries
308. I was denied a Doctor "neurological" with equipment.
309. I've sought Access to Courts through Request an grievances concerning the case. With E.P.S.O. (Law Library)
310. Requested Case law, Attorney Phone calls, paper, pen, copy's, Certified mail for legal correspondence
311. Envelopes, several times through Request an grievances to no avail
312. As I have observed All inmates are denied these rights here at E.P.S.O
313. I personally have addressed Sheriff Richard Wiles several times concerning access to law library and the abvious lack of adequate training of staff when it comes to access to courts,
314. He refuses to act or respond.
315. I continue to suffer From Sleep Paralyze, Migraines, Nose Bleeds, an Blackouts

*Sig* Devoris Newson m.m. 3<sup>rd</sup>  
 DEVORIS NEWSON #9546176  
 12501 Montana Ave.  
 El Paso T.X. 79938

If the person signing is not petitioner, state relationship to petitioner and explain why petitioner is not signing this petition. \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_

V. RELIEF REQUESTED:

Count I 1. \*Core Civic: \$10,000,000 Monetary damages \$5,000,000 punitive <sup>compensatory</sup> \$5,000,000  
 U.S. 8th amend. violation, "Deliberate Indifference to safety," "Failure to Protect,"  
 A. "Deliberate indifference to medical needs," "Understaffing," "Failure to properly  
 train staff," "Cultivating Unsecure, Violate Conditions) Against Prisoners"]

Count II 2. \*Core Civic: \$10,000,000 (punitive damages) (1st 8th 14th Retaliation Claims U.S. Const. Amend)  
 CEO Hammond  
 Trinity Food Inc.

Count III 3. B. Count III 8th amend. Failure to Protect Claim Based on deliberate indifference  
 to plaintiffs Individualized Risks pursuant to 42 U.S.C. 1983 against Core Civic  
 \$10,000,000 punitive or compensatory (Core Civic)

Count IV C. \*CEO Dan Hininger 8th Amend Failure to Protect Claim Based on Deliberate  
 Indifference to "Prisoners" \$10,000,000 punitive or compensatory (Individual  
 compacity)

Count V \*CEO Dan Hininger 8th Amend Failure to Protect Claim Base on Deliberate  
 Indifference to Plaintiff's Individualized Risk, Medical Care, understaffing,  
 D. failure to train staff, cultivating violent culture.  
 \$10,000,000 punitive or compensatory (Each Individual Compacity)

Count VI \*CEO DAN Hininger 42 U.S.C. 1985 (a)(3) Conspiracy to deprive plaintiff of his  
 5th, 14th U.S. Const. Rights to substantive or  
 E. And for any such further relief this Court deems just and proper. Procedural Due Process of  
 Law \$10,000,000 punitive damages \$10,000,000 compensatory (Individual Compacity)

I or We do hereby certify under penalty of perjury that the above complaint is true  
 and accurate to the best of my or our knowledge, information, memory and belief.

Signed this the 13<sup>th</sup> day of May, 2023.

Signature: [Signature] <sup>30</sup>mm. <sup>30</sup>mm.

No.: 9546176

Address: Trousdale-Turner Correctional Center  
 140 Macon Way  
 Hartsville, TN 37074

VOID

E.P.J.A. (323)  
 12501 Montana Ave.  
 El Paso T.X. 79938

Notary: \_\_\_\_\_

Date: \_\_\_\_\_

COUNT VIII 1st amendment Denial of Access to Courts  
 claim Against Sheriff Richard Wiles  
 Individual an Official compacity  
 \$500,000 \$500,000

Count IX 8th Amendment denial of medical care  
 Sheriff Richard Wiles Individual Compacity  
 \$500,000

Count VII 8th Amend. Failure to Protect Claim Based on Deliberate Indifference to  
 Plaintiff Individualized Risk pursuant to 42 U.S.C. 1983  
 Governor of T.N. ~~CEO Dan~~ T.D.C. Commissioner, Warden of TTCC, STEWART DIRECTOR.  
 Fairbanks, Wagner, Daily, Chief Harris, Unit Manager Robinson, Case Manager Bail, CO#  
 Captain Smith, CO# Spence, Leon \$5,000,000 Each Individual Compacity

Count VIII 8th Amend. Violation Failure to Protect claim Based on deliberate Indifference  
 Towards prisoners CO# Spence, Captain Smith, Chief Warden of TTCC  
 Unit Manager Robinson, Chief Harris, Fairbanks, Daily, Wagner, CEO Hammond,  
 Trinity Food Inc., CO# LEON, T.D.C. Commissioner, Governor of T.N.  
 Count VIII 1st, 8th, 14th Retaliation claim  
 Governor of T.N., T.D.C. Commissioner, Fairbanks, Wagner, Daily, Leon, Spence, Captain  
 Smith, Chief Harris, Unit Manager Robinson (\$5,000,000 Individual compacity)



[illegible]

**THE UNTOUCHABLES**

ROBERT DE NIRO  
KELLY MCGILLIS  
MICHAEL VARTAN  
JAMES CAAN  
JAMES WOOD  
JAMES BROWN  
JAMES GANDY

THE UNTOUCHABLES  
A FILM BY JOHN DAHL

OPEN FREE  
OPEN FREE  
216203401





ALL PLACES LOCATED  
IN THE COUNTY

